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15 *Attorneys for Defendant Zuffa, LLC, d/b/a*
Ultimate Fighting Championship and UFC
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17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,
on behalf of themselves and all others similarly
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

25
26 Defendant
27
28

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF STACEY K.
GRIGSBY IN SUPPORT OF
DEFENDANT ZUFFA, LLC'S REPLY
IN SUPPORT OF ITS MOTION TO
SEAL PLAINTIFFS' REPLY IN
SUPPORT OF PLAINTIFFS'
MOTION TO CERTIFY CLASS AND
RELATED MATERIALS (ECF NO.
554)**

1 I, Stacey K. Grigsby, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia and the bar of
3 the State of New York. I am admitted *pro hac vice* to practice before this Court. I am a Partner in
4 the law firm Boies Schiller Flexner LLP (“BSF”), counsel for Zuffa, LLC (“Zuffa”) in the above
5 captioned action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No.
6 2:15-cv-01045-RFP-PAL.

7 2. I make this declaration in support of Zuffa’s Reply in Support of Its Motion to Seal
8 Plaintiffs’ Reply in Support of Plaintiffs’ Motion to Certify class and Related Materials (ECF No.
9 554) (“Reply in Support of Motion to Seal”). Based on my personal experience, knowledge, review
10 of the files, records, and communications in this case, I have personal knowledge of the facts set
11 forth in this Declaration and, if called to testify, could and would testify competently to those facts
12 under oath.

13 3. On June 14, 2018, I met and conferred with Kevin Rayhill, counsel for Plaintiffs.
14 During that meet and confer, I asked Mr. Rayhill for specific examples of documents or portions of
15 documents that Plaintiffs believed should be unsealed. Mr. Rayhill did not provide any specific
16 examples and instead said that Plaintiffs believed that only confidential third-party information—not
17 Zuffa’s information—should remain under seal.

18 4. I told Mr. Rayhill that Zuffa did not agree with his position.

19 5. Now that Plaintiffs have filed their Opposition to Zuffa’s Motion to Seal, I, and others
20 representing Zuffa, now understand what specific documents and portions of documents—and,
21 importantly, Plaintiffs’ justifications for unsealing those documents and portions thereof— Plaintiffs
22 seek to unseal.

23 6. Exhibit 1 to this declaration is a true and correct copy of the Declaration of William
24 Hunter Campbell in Support of Zuffa’s Reply in Support of Motion to Seal. I have obtained Mr.
25 Campbell’s consent to file his declaration with his signature.

26 7. Exhibit 2 to this declaration is a document that provides Zuffa’s responses to Exhibit
27 1 to the Declaration of Kevin E. Rayhill in Support of Plaintiffs’ Opposition to Defendant Zuffa’s
28 Motion to Seal Plaintiffs’ Reply in Support of Class Certification (ECF No. 557).

8. Exhibit 3 to this declaration is a document that provides Zuffa's justifications for sealing new categories of information the Court had not previously considered or only partially considered in earlier sealing motions.

9. Exhibit 4 to this declaration is a true and correct copy of a June 10, 2018 letter I sent the Court via e-mail, copying counsel for Plaintiffs and Mr. John S. Nash, in response to a June 3, 2018 e-mail from Mr. Nash.

10. Exhibit 5 to this declaration is a true and correct copy of Plaintiffs' Reply in Support of Plaintiffs' Motion for Class Certification ("Plaintiffs' Class Certification Reply") with redactions applied. This Exhibit contains fewer redacted material than the publicly version of the Reply. Zuffa believes that this version should be filed publicly.

11. Exhibit 6 to this declaration is a true and correct copy of Exhibit 86 of Plaintiffs' Class Certification Reply with redactions applied. Zuffa believes that this version should be filed publicly.

12. Exhibit 7 to this declaration is a true and correct copy of an excerpt of the deposition transcript, Volume 2, of the deposition of former Zuffa employee Michael P. Mersch taken in this matter. The excerpt is a true and correct copy other than the addition of redboxes to mark the portions of the transcript cited in the Reply in Support of the Motion to Seal.

13. Exhibit 8 to this declaration is a true and correct copy of an article written by Maury Brown, titled *Exclusive Infographics Show NFL, MLB, NBA and NHL Sponsorship Growth over Last Decade*, from Forbes.com, dated August 25, 2017, and available at <https://www.forbes.com/sites/maurybrown/2017/08/25/exclusive-infographics-show-nfl-mlb-nba-and-nhl-sponsorship-growth-over-last-decade/#4c0009dd907b>

14. Exhibit 9 to this declaration is a true and correct copy of an article written by Ariel Helwani, titled *Former UFC star Lyoto Machida signs multifight deal with Bellator*, from ESPN.com, date June 22, 2018, and available at http://www.espn.com/mma/story/_/id/23875600/former-ufc-star-lyoto-machida-signs-multifight-deal-bellator.

15. Exhibit 10 to this declaration is a true and correct copy of an article written by Brad

1 Popkin, titled *Interview: WSOF 24's Jon Fitch plans to 'bury' Yushin Okami tonight, talks 'corrupt'*
2 *USADA and more*, from MMAMania.com, dated October 17, 2015, and available at
3 [https://www.mmamania.com/2015/10/17/9536767/interview-wsof-24-jon-fitch-plans-burying-](https://www.mmamania.com/2015/10/17/9536767/interview-wsof-24-jon-fitch-plans-burying-yushin-okami-talks-corrupt-usada-mma)
4 [yushin-okami-talks-corrupt-usada-mma](https://www.mmamania.com/2015/10/17/9536767/interview-wsof-24-jon-fitch-plans-burying-yushin-okami-talks-corrupt-usada-mma).

5 16. Exhibit 11 to this declaration is a true and correct copy of an article written by named
6 Plaintiff Nathan Quarry, titled *Our (first) Day in Court*, from Zombiecagefighter.com, dated May 8,
7 2015, and available at <http://www.zombiecagefighter.com/our-first-day-in-court/>.

8 17. Exhibit 12 to this declaration is a true and correct copy of an article written by Percy
9 Crawford, titled *Nate Quarry Opens Up on UFC Anti-Trust Lawsuit; Explains How Dana White Is*
10 *Starving Fighters*, from Fight Hype, dated October 5, 2016, and available at
11 <http://www.fighthype.com/news/article26311.html>.

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13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing facts are true and correct. Executed this 26th day of June, 2018 in Washington, DC.

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16 /s/ Stacey K. Grigsby

17 Stacey K. Grigsby
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